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June 23, 2022

SO ORDERED.



6/24/2022

Via ECF

Hon. Loretta A. Preska
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Petersen Energía Inversora, S.A.U. v. Argentine Republic*, No. 15-cv-02739 (“*Petersen*”)
Eton Park Capital Management, L.P. v. Argentine Republic, No. 16-cv-8569 (“*Eton Park*”)

Your Honor:

Pursuant to Rule 2(H) of Your Honor’s Individual Practices and Paragraph 13 of the stipulation and order governing the production and exchange of confidential materials in these actions (*Petersen*, Dkt. 177; *Eton Park*, Dkt. 124) (the “Protective Order”), Plaintiffs Petersen Energía Inversora, S.A.U., Petersen Energía, S.A.U., Eton Park Capital Management, L.P., Eton Park Master Fund, Ltd., and Eton Park Fund, L.P. (collectively, “Plaintiffs”) respectfully move for an order granting leave to file under seal Plaintiffs’ Combined Reply in Support of Their Motion for Summary Judgment (the “Reply”), and Exhibits 156-57, 162-66, 171, and 173 to the Declaration of George W. Hicks, Jr., in Support of Plaintiffs’ Combined Reply in Support of Their Motion for Summary Judgment.

Plaintiffs’ Reply contains descriptions of or quotations from the deposition of YPF’s former Controller Diego Pando, portions of which have already been filed under seal as authorized by the Court on April 15, 2022 (*Petersen*, Dkt. No. 382; *Eton Park*, Dkt. No. 312). Plaintiffs’ Reply also contains descriptions of or quotations from the following documents, which have already been filed under seal, but over which the Court’s authorization is pending:

- Transcripts of the depositions of Defendants’ experts Aida Kemelmajer, Rafael Manóvil, and Judge Alejandro Uslenghi

In addition, Plaintiffs’ Reply contains descriptions of or quotations from portions of the following materials that Defendants designated confidential under the Protective Order:

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- Transcripts of the depositions of YPF's former Controller Diego Pando (additional portions beyond those noted above) and Argentina's 30(b)(6) witness Nicolas Diana; and Defendants' experts Steven Davidoff Solomon, Mariana Pargendler, Daniel Marx, Aida Kemelmajer (additional portions beyond those noted above), Jeffrey Harris, and Juan Pablo Comadira

The following Exhibits to the Declaration of George W. Hicks, Jr., contain descriptions of or quotations from, or are themselves, materials designated confidential under the Protective Order:

Exhibit 156 contains excerpts from the transcript of the March 8, 2022 deposition of Daniel Marx, which Defendant YPF S.A. designated confidential under the Protective Order.

Exhibit 157 contains excerpts from the transcript of the August 26, 2021 deposition of Nicolas Diana and the corresponding errata sheet, which Defendant Republic of Argentina designated confidential under the Protective Order.

Exhibit 163 contains excerpts from the transcript of the February 25, 2022 deposition of Jeffrey Harris and the corresponding errata sheet, which Defendant Republic of Argentina designated confidential under the Protective Order.

Exhibit 164 contains excerpts from the transcript of the March 10, 2022 deposition of Julio Pablo Comadira and the corresponding errata sheet, which Defendant YPF S.A. designated confidential under the Protective Order.

Exhibit 165 contains excerpts from the transcript of the March 3, 2022 deposition of Aída Kemelmajer and the corresponding errata sheet, which Defendant YPF S.A. designated confidential under the Protective Order.

Exhibit 166 contains excerpts from the transcript of the February 16, 2022 deposition of Mariana Pargendler and the corresponding errata sheet, which Defendant YPF S.A. designated confidential under the Protective Order.

Exhibit 171 contains excerpts from the transcript of the March 10, 2022 deposition of Steven Davidoff Solomon, and the corresponding errata sheet, which Defendant YPF S.A. designated confidential under the Protective Order.

Exhibit 173 contains excerpts from the transcript of the August 6, 2021 deposition of Diego Pando, and the corresponding errata sheet, which Defendant YPF S.A. designated confidential under the Protective Order.

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Exhibit 162, Rebuttal Expert Report of Rafael Manóvil, dated Dec. 3, 2021, quotes deposition testimony that Plaintiff Petersen designated confidential under the Protective Order. It also characterizes deposition testimony that third-parties designated confidential under the Protective Order.

Respectfully submitted,

/s/ Paul D. Clement
Paul D. Clement

Cc: All counsel of record via ECF